

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

**Criminal No.  
11-10286-DPW**

**UNITED STATES OF AMERICA**

**VS.**

**CATHERINE GREIG**

**DEFENDANT'S MOTION FOR MISCELLANEOUS RELIEF**

Now comes the defendant, Catherine, Greig, in the above numbered indictment and respectfully requests that this Honorable Court enter a decision on the defendant's request for release upon terms, conditions and sureties.

In support of this motion the defendant notes that she has submitted a comprehensive request seeking release buttressed by the posting of collateral as a surety on the bond for her release. Significant time and money was expended to clear title, compile opinions of sufficiency of title as well as preparation of deeds of trust and documents necessary to effectuate her release in the event that the Court deemed that appropriate.

A lengthy hearing was held with the taking of evidence and at the conclusion the defendant continued to submit to voluntary detention to allow sufficient time for Pretrial Services to conduct their investigation as well as to

allow the government to prepare and file its response. After a significant and comprehensive investigation Pretrial Services filed its recommendation with this Court and the defendant requested that this Court render a decision. The Court extended the time for the government to file its response which the government did in a timely fashion.

The defendant, as has been represented to the Court, is a qualified candidate for release in accordance with the recommendations made to this Court including electronic surveillance with strict no contact orders, random checks by Pretrial Services and the posting of the real estate in her name and that of her sister constituting a significant amount of surety.

The defendant is presumed innocent and understands the unique circumstances of this case but is requesting that this Court render a decision directing her release subject to whatever terms and conditions the Court feels are appropriate or denying the request to allow the defendant to present her appeal to the Honorable Douglas Woodlock who is the District Judge assigned to this case.

Local Rule 7.1 Certification

The defendant has conferred with the United States in an attempt to narrow or resolve this issue.

Catherine Greig,  
By her attorney



/s/ Kevin J. Reddington, Esq.

CERTIFICATE OF SERVICE

I, Kevin J. Reddington, Esq., Attorney for the Defendant, Catherine Greig, hereby certify that the following documents filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on November 4, 2011.

DEFENDANT'S MOTION FOR MISCELLANEOUS RELIEF



/s/ Kevin J. Reddington, Esq.